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October 31, 2019

Via ECF

Honorable P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: **Unicomer Courts Dominica Ltd v Tropical Shipping USA LLC**
19cv8537 (PKC)
Our File: 424-82

Dear Honorable Judge:

We represent the plaintiff in the referenced matter.

The bill of lading issued by defendant Tropical Shipping USA LLC contains a mandatory forum selection clause requiring that all actions arising under said bill of lading are subject to the jurisdiction of the United States District Court for the Southern District of Florida.

Defense counsel have advised that they insist that we honor that clause.

Accordingly we respectfully request that Your Honor request that the Clerk of the Court transfer this case to the USDC SDFla.

On plaintiff's motion and without opposition, the action is transferred, pursuant to 28 U.S.C. § 1404(a), to the United States District Court for Southern District of Florida. The Clerk shall transfer the action and close the case in this district.

Respectfully submitted,
CASEY & BARNETT, LLC

Martin F. Casey

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SO ORDERED
VS DJ
11.13.19